March 27, 2023

VIA ECF

Hon. Lorna G. Schofield United States District Court for the Southern District of New York 500 Pearl Street New York, NY 10007

Re: Global Gaming Philippines, LLC v. Razon, Jr., et al., 21 Cv. 2655 (LGS) (SN)

Dear Judge Schofield,

Plaintiff Global Gaming Philippines, LLC ("GGAM") and Defendant Enrique K. Razon ("Razon"), and Defendants Bloomberry Resorts and Hotels Inc. ("BRHI") and Sureste Properties, Inc. ("SPI") respectfully submit this joint request for oral argument on the following motions:

- GGAM's Motion to Recognize and Enforce a Foreign Arbitral Award Against Defendants BRHI and SPI (Dkt. 327);
- BRHI's and SPI's Cross-Motion for Summary Judgment for Lack of Personal Jurisdiction (Dkt. 357);
- Razon's Motion for Summary Judgment (Dkt. 335); and
- GGAM's Motion for Partial Summary Judgment Against Defendant Razon (Dkt. 360).

The present request is timely pursuant to Individual Rule III(B)(6) and this Court's scheduling orders dated December 30, 2022 (Dkt. 321) and February 28, 2023 (Dkt. 380).

The parties also request that, following the close of briefing on the above-referenced motions, the parties jointly submit all deposition transcripts and expert reports cited in the motions pursuant to Individual Rule III(B)(3). This will prevent the Court from receiving multiple copies of the same deposition transcripts and expert reports multiple times. The parties will request a link to upload the courtesy copies from Schofield_NYSDChambers@nysd.uscourts.gov.

Respectfully submitted,

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

/s/ Kaitlyn A. Crowe

Kevin N. Ainsworth Barry Bohrer Kaitlyn A. Crowe Daniel T. Pascucci Joseph R. Dunn

919 Third Avenue New York, NY 10022 T: (212) 935-3000 F: (212) 983-3115 kainsworth@mintz.com bbohrer@mintz.com jhalperin@mintz.com kacrowe@mintz.com dtpascucci@mintz.com jrdunn@mintz.com Attorneys for Plaintiff Global Gaming Philippines, LLC

Milbank LLP

/s/ Brett P. Lowe

Daniel M. Perry 55 Hudson Yards New York, NY 10001 Telephone: (212) 530-5000 Facsimile: (212) 530-5219 dperry@milbank.com

Erin M. Culbertson

Brett P. Lowe (admitted pro hac vice)

1850 K Street, NW

Suite 1100

Washington, DC 20006 Telephone: (202) 835-7500 Facsimile: (202) 263-7586 eculbertson@milbank.com blowe@milbank.com Counsel to Defendants Bloomberry Resorts and Hotels Inc. and Sureste

Walfish & Fissell PLLC

Properties, Inc.

By: /s/ Rachel Penski Fissell

Rachel Penski Fissell Daniel R. Walfish

405 Lexington Avenue, Fl 8 New York, NY 10174 Tel.: 212-672-0523 rfissell@walfishfissell.com dwalfish@walfishfissell.com Attorneys for Defendant Enrique K. Razon, Jr.